

Exhibit H

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

ALEC CERULLO,
Plaintiff

v.

**LT. GALLIGAN, LIEUTENANT
CO CALISE, CORRECTIONAL OFFICER
LT. TIERNEY, LIEUTENANT
INDIVIDUALLY AND IN THEIR
OFFICIAL CAPACITIES**
Defendants

C.A. No. 15-531-M-PAS

AFFIDAVIT OF CORY CLOUD

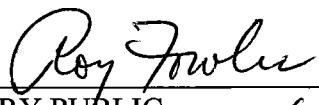
I, Cory Cloud, being duly sworn, depose and state as follows:

1. I am the Grievance Coordinator for the Rhode Island Department of Corrections.
2. From February 10, 2014 to the present the Department of Corrections has maintained Grievance Policy (#13.10-2) which provides an informal first step to request for resolution of a grievance and a formal two-tiered level procedure for the filing of inmate grievances. Exhibit J, Grievance Policy.
3. All inmates/detainees are permitted to file a grievance concerning the conditions of their confinement, an issue pertaining to the interpretation or implementation of any departmental policy, access to privileges, services or programs, individual employee actions, including any access to the grievance procedure or the provision of grievance forms, any reprisal for use of the inmate grievance procedure and loss or damage to property. Exhibit J, Grievance Policy.
4. The informal first step requires the grievant to give his/her block officer or area Lieutenant a "pink slip" requesting a resolution to the grievance. Exhibit J, Grievance Policy.
5. The grievant may then proceed to the formal two-tiered grievance procedure. The first level requires the grievant to file a grievance with the Warden of the facility that is implicated. Exhibit J, Grievance Policy.
6. The second level of a grievant's administrative remedy is to appeal to the Director of the Department of Corrections. Exhibit J, Grievance Policy.

7. I am designated and sworn by the Director to coordinate and monitor the Department inmate grievance procedure and receive and review all grievances at the second level.
8. I have reviewed the files and records maintained in my office relative to inmate/detainee grievances. I thoroughly checked said records and found that plaintiff has filed two level-1 grievances relevant to this matter which are attached to defendants' motion for summary judgment and are numbered in my files as 2015-0099 and 2015-0100. Exhibits C, Grievance 2015-0099; Exhibit D, Grievance 2015-0100.
9. After a due and diligent search, my office maintains no record of a level-2 grievance appealing the two level 1 grievances numbered 2015-0099 and 2015-0100 to my office and I do not recall ever receiving a level-2 grievance appealing these two level-1 grievances.
10. After a due and diligent search, my office maintains no record of any additional level-1 grievances related to this matter.
11. A review of my files also shows that after the above referenced grievances were filed, plaintiff has filed another level-1 and a level-2 grievance on an unrelated matter.
12. Policies 13.10-2, which is attached to defendants' motion for summary judgment is a true copy of the original as was in effect from February 10, 2014 to the present. Exhibit J, Grievance Policy.


Cory Cloud

29th Subscribed and sworn to before me in the City of Cranston, State of Rhode Island on this day of April, 2016.


NOTARY PUBLIC
Commission Expires: 2/15/2019